

# Exhibit 8



Charles L. Babcock  
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cbabcock@jw.com

March 10, 2022

**Via Federal Express and Email**

Shy David Anderson  
c/o Lisa Duffee  
4311 Oak Lawn Ave  
Dallas, TX 75219  
[lisa@d-elaw.com](mailto:lisa@d-elaw.com)

**Re: Document Preservation Notice**

Dear Mr. Anderson (through your attorney Ms. Lisa Duffee),

As you know, I represent your father-in-law Jerral W. Jones, Sr. He has asked my firm to investigate whether he has potential claims against you and others for conversion (extortion) and other torts and to determine whether a conspiracy exists among yourself and others including, without limitation, certain of your lawyers. In that regard we believe that certain exceptions to the attorney client, common interest and attorney work product privileges may apply so please do not destroy any communications in any form with your counsel or others under the assumption that such privileges apply.

As of this date you and your counsel can reasonably anticipate litigation even though our investigation is not yet complete. Therefore we demand that you preserve all communications in any form regarding the matters outlined below (“Preservation Topics”) and that you immediately image your personal devices such as cell phones, tablets, computers or other electronic devices of any kind in order to preserve material to date. We also demand that you not delete any information in the future until this matter is resolved and this includes any form of communication through the electronic devices outlined above.

The law imposes on you a duty to preserve materials that are potentially relevant to the Preservation Topics. You and all other individuals working for, on behalf of, or associated with you, are hereby instructed to not destroy any data or documents related in any way to the above matters. This includes, without limitation, all letters, correspondence, emails, text messages, phone records and messages, notes, or any other communications. And merely relying on whatever preservation steps (if any) you have taken during existing proceedings would not satisfy the preservation duty you have related to the issues set out in this notice. A non-exhaustive list of reasonable steps would include at a minimum: immediately issuing a hold notice to relevant custodians; following up with them to ensure they have complied with the notice; engaging with information technology personnel to determine where relevant information is stored; and working

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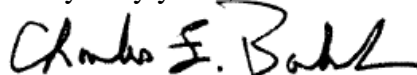
with human resources and computer forensics professionals to ensure that information maintained by any affiliated persons or entities is properly preserved. The scope of your preservation obligations continues until resolution of the controversy, and you should monitor ongoing compliance with your preservation obligation.

Preservations Topics are as follows:

- 1) All efforts to obtain monies from Mr. Jones directly or indirectly through the divorce proceedings with his daughter and your wife Charlotte;
- 2) All efforts to obtain monies from Mr. Jones directly or indirectly;
- 3) All efforts to obtain information you and/or your counsel consider embarrassing to Mr. Jones;
- 4) The circumstances under which you or your counsel obtained the confidential document introduced at his deposition as Exhibit JWJ 319;
- 5) All communications with Andrew Bergman concerning my client and/or any member of Mr. Jones' family;
- 6) All communications with or about Cynthia Davis-Spencer who at one time may have been known as Cynthia or Cindy Davis;
- 7) All communications with any person about Mr. Jones during the pendency of your divorce proceedings including, without limitation, communications with Carrie Keep;
- 8) All communications with Alexandra Davis or her current or former employer;
- 9) All communications with any person regarding an incident with certain Dallas Cowboys cheerleaders which was the subject of an article by ESPN; and
- 10) All communications with or regarding Vincent Thompson or his representatives.

Thank you for your attention to this matter.

Very truly yours,

  
Charles L. Babcock

CLB: smz